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District Court

MAY 23 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorney for Defendant Zheng, Ming Yan

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA)	CRIMINAL ACTION NO. 05-00027
)	
Plaintiff)	
)	DEFENDANT ZHENG'S
v.)	VOIR DIRE QUESTIONS
)	
ZHENG MING YAN and LIU, CHANG)	
DA)	
)	
Defendant)	
_____)	

Defendant Zheng Ming Yan hereby submits her proposed voir dire questions.

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PERSONAL

1. How long have you lived on Saipan?
2. Are you a citizen of the U.S. or Trust Territory?
3. Have you or a member of your family or a close friend ever been the victim of a crime?
4. If so:
 - A. Who was the victim?
 - B. What was the nature of the crime?
 - C. When did the crime occur?
 - D. Was the crime solved?
 - E. Was anyone charged with the crime?
 - F. Did the case go to court?
 - G. Did you testify?
 - H. What was the result of the trial?
5. Have you ever served on a jury before?
6. If so:

- A. Was it a criminal or civil case?
 - B. What type of case was it?
 - C. Did the jury reach a verdict?
 - D. What was the verdict?
7. Are you presently under treatment by a doctor or taking any prescription medicine?
8. If so:
- A. What is the treatment or medication?
 - B. Does it affect you alertness or ability to think clearly?
9. Do you have any off-island trips scheduled within the next 1 to 1 1/2 weeks?
10. This case will last about 1 to 1 1/2 weeks, is there any reason why you believe you can not or should not serve as a juror in this case?

EMPLOYMENT

- 1. Are you employed?
- 2. What is your position?
- 3. Who is your employer?

4. How long have you been employed with your employer?
5. Have you ever been employed with a law enforcement agency?
6. Who are your previous employers?
7. If this trial takes 1 to 1 1/2 weeks, will it cause you any job related problems to serve as a juror?

FAMILY

1. Are you married?
2. Who is your husband or wife?
3. Where is your husband or wife employed?
4. Has your husband or wife ever been employed with a law enforcement agency?
5. Do you have a common-law husband or wife?
6. If so, who is your common-law husband or wife?
7. Where is your common-law husband or wife employed?

8. Has your common-law wife or husband ever been employed with a law enforcement agency?
9. Do you have any children?
10. If so:
 - A. What are their ages?
 - B. Are any of your children living with you now?
 - C. Are any of your children employed?
 - D. If so:
 - (i) Who is their employer?
 - (ii) What is their position?
 - E. Have any of your children ever been employed with a law enforcement agency?
 - F. If so:
 - (i) What agency?
 - (ii) When were they employed?

11. Are you related to or close friends with any person listed on this sheet?

12. If so:

(i) Identify the person or persons to whom you are related?

(ii) What is the nature of your relationship to each person identified?

(iii) How often do you see each person?

(iv) Do they live near you?

(v) Are you planning or expect to see the person over the Thanksgiving holiday?

13. Do you have any relatives or close friends employed with the Department of Public Safety, the Attorney General's Office, the United States Attorney's Office or any other law enforcement agency ?

14. If so,

(i) Please identify the individual?

(ii) Please state where the person works.

(iii) What is their position?

- (iv) What is the nature of your relationship to each person?
 - (v) How often do you see each person?
 - (vi) Do they live near you?
15. During the course of this trial will you discuss this case with your husband or wife, common-law husband or wife, children, relatives or friends?

PUBLICITY

- 1. Do you read any local newspaper regularly?
- 2. Do you watch the local news on television regularly?
- 3. Do you tend to believe most of what you read in the local newspaper?
- 4. Do you tend to believe most of what you see or hear on the local television news?
- 5. Do you tend to believe most of what you hear on the news broadcast on local radio stations?

6. If you tend to believe most of the local news printed in the newspaper or broadcast on local television or radio please state why?
7. Have you heard of this case before?
8. If so:
 - A. How did you hear about this case?
 - B. What did you hear about this case?
 - C. Do you believe what you heard?
 - D. If you do not believe what you heard about the case please explain why?
9. Can you stop reading the newspaper for the duration of this trial which should last 2 to 3 weeks?
10. Can you stop watching the local news on television for the duration of this trial which should last 2 to 3 weeks?
11. Can you stop listening to the news on all local radio stations for the duration of this trial which should last 2 to 3 weeks?

CASE SPECIFICS

1. Do you tend to believe a person is guilty because he has been arrested by the police?
2. Do you tend to believe a person is guilty because he is charged by the government with committing a crime?
3. Do you tend to believe a person is guilty because he is on trial for being charged with having committed a crime?
4. Do you think the government can charge an innocent person with a crime?
5. Do you tend to believe that a police officer is more truthful than other people?
6. Do you believe a person is innocent if he is on trial for being charged with having committed a crime?
7. Can you decide this case based on the evidence and the law instead of your moral or religious beliefs?
8. Do you believe a person can voluntarily be a prostitution?"
9. Do you believe some aliens exaggerate or make false claims or allegations in order to benefit themselves.
10. Do you believe prostitution is a problem on Saipan?
11. Do you believe that a person must be involved in prostitution if they know or associate with people who are involved in prostitution?
12. If the evidence shows that the defendant was not a member of the

conspiracy charged in the indictment can you return a not guilty verdict?

13. Ms. Zheng, the defendant in this case is an alien, do you dislike aliens?
14. Do you believe there are too many aliens on Saipan?
15. Do you believe aliens are mainly responsible for crime on Saipan?
16. Do you believe aliens are mainly responsible for the drug problem on Saipan?
17. Do you tend to believe Ms. Zheng is probably guilty because she is an alien?
18. Ms. Zheng is a person of Chinese descent, do you dislike Chinese?
19. Do you believe there are too many Chinese on Saipan?
20. Do you believe Chinese are mainly responsible for crime on Saipan?
21. Do you believe aliens are mainly responsible for prostitution on Saipan?
22. Do you tend to believe Ms. Zheng is guilty or probably guilty because she is Chinese?
23. Have all your answers to all of these questions been truthful?